UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

IHANCE, INC., and ANDREW J. KNOX,

Plaintiffs,

v.

No. 2:11-cv-257-MSD-FBS

ELOQUA LIMITED and ELOQUA CORPORATION,

Defendants.

JOINT STIPULATION OF DISMISSAL

On this day, came the parties, by counsel, pursuant to Rule 41(a) and, based upon a settlement, stipulated that: (1) all claims brought by the Plaintiffs are dismissed with prejudice; and (2) all counterclaims brought by the Defendants are dismissed without prejudice; and (3) Defendants' Motion for Sanctions, Fees and Just Costs (D.I. 308) is dismissed with prejudice. The parties further stipulate that each party shall bear its own costs, including attorneys' fees.

SO STIPULATED:

/s/Stephen E. Noona

Stephen E. Noona (Virginia Bar No. 25367) KAUFMAN & CANOLES, P.C. 150 West Main Street Norfolk, VA 23510

Tel: (757) 624-3000 Fax: (757) 624-3169 senoona@kaufcan.com

Timothy J. Rousseau (admitted *pro hac vice*) GOODWIN PROCTER LLP

The New York Times Building

620 Eighth Avenue

New York, NY 10018

Tel: (212) 813-8800 Fax: (212) 355-3333

trousseau@goodwinprocter.com

Douglas J. Kline (admitted *pro hac vice*)

Elaine Herrmann Blais (admitted pro hac vice)

William A. Meunier (admitted *pro hac vice*)

Adam R. Wichman (admitted *pro hac vice*)

GOODWIN PROCTER LLP

Exchange Place

53 State Street

Boston, MA 02109

Tel: (617) 570-1000

Fax: (617) 523-1231

dkline@goodwinprocter.com

eblais@goodwinprocter.com

wmeunier@goodwinprocter.com

awichman@goodwinprocter.com

Attorneys for Defendants

Eloqua, Inc. f/k/a Eloqua Limited and Eloqua Corporation

SO STIPULATED:

/s/Robert M. Tata

Robert M. Tata

(Virginia Bar No. 30101)

HUNTON & WILLIAMS LLP

500 E. Main Street, Suite 1000

Norfolk, Virginia 23510

Tel: (757) 640-5300

Fax: (757) 625-7720

btata@hunton.com

Paul B. Gaffney

Thomas G. Hentoff

John M. McNichols

Thomas S. Fletcher

Eric C. Wiener

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, D.C. 20005

Tel: (202) 434-5000

Fax: (202) 434-5209

pgaffney@wc.com

thentoff@wc.com

jmcnichols@wc.com

tfletcher@wc.com

ewiener@wc.com

Attorneys for Plaintiffs, iHance, Inc. and Andrew J. Knox